

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS RICHARD PATELUNAS  
(OCA/USPS-T15-1)  
August 8, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

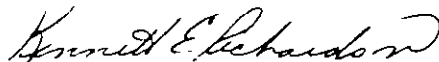
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T15-1. The following table was taken from USPS-15D and USPS-15J.

Columns 1, 2, and 4 were taken directly from your exhibits. Column 3 is the sum of columns 1 and 2 and column 5 is the difference between column 3 and column 4.

Please explain the differences in column 5. If any of these numbers are incorrect, please indicate which ones and correct them. If any of these comparisons are incorrect, please so indicate and provide the correct comparisons.

## USPS-15D

CS	1 Volume Variable Total	2 All Other Costs	3 Sum 1 and 2	4 Accrued Costs	5 Difference
1	304,591	1,364,345	1,668,936	1,668,936	0
2	1,597,625	1,479,466	3,077,091	3,355,519	278,428
3	12,102,896	1,626,043	13,728,939	17,062,705	3,333,766
4	4,215	5,508	9,723	9,723	0
6	3,320,557	396,794	3,717,351	3,717,351	0
7	2,302,729	5,751,447	8,054,176	8,098,978	44,802
8	264,334	169,125	433,459	433,459	0
9	57,773	51,918	109,691	109,691	0
10	1,608,020	1,967,815	3,575,835	3,575,835	0
11	1,379,577	809,352	2,188,929	2,188,929	0
12	163,064	456,250	619,314	619,314	0
13	7,405	271,664	279,069	279,069	0
14	3,564,763	547,923	4,112,686	4,112,686	0
15	897,379	514,856	1,412,235	1,412,235	0
16	1,151,297	1,555,786	2,707,083	2,707,083	0
17	-	54,211	54,211	54,211	0
18	1,704,692	2,461,626	4,166,318	4,166,318	0
19	-	36,405	36,405	36,405	0
20	2,068,563	1,578,740	3,647,303	3,647,303	0
Total	32,499,480	21,099,274	53,598,754	57,255,750	3,656,996

## USPS-15J

CS	1 Volume Variable Total	2 All Other Costs	3 Sum 1 and 2	4 Accrued Costs	5 Difference
1	318,667	1,393,948	1,712,615	1,712,615	0
2	1,696,664	1,533,270	3,229,934	3,517,945	288,011
3	12,664,607	1,678,820	14,343,427	17,759,605	3,416,178
4	4,422	5,651	10,073	10,073	0
6	3,151,899	407,192	3,559,091	3,559,091	0
7	2,374,474	5,943,399	8,317,873	8,401,441	83,568
8	276,306	172,666	448,972	448,972	0
9	61,039	53,072	114,111	114,111	0
10	1,674,475	2,047,129	3,721,604	3,721,604	0
11	1,480,469	835,248	2,315,717	2,315,717	0
12	171,494	476,500	647,994	647,994	0
13	7,904	283,721	291,625	291,625	0
14	3,760,945	565,577	4,326,522	4,326,522	0
15	950,339	590,346	1,540,685	1,540,685	0
16	1,529,270	2,002,125	3,531,395	3,531,395	0
17	-	57,201	57,201	57,201	0
18	1,834,863	2,760,838	4,595,701	4,595,701	0
19	-	38,973	38,973	38,973	0
20	2,302,512	1,796,339	4,098,851	4,098,851	0
Total	34,260,349	22,642,015	56,902,364	60,690,121	3,787,757

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
KENNETH E. RICHARDSON  
Attorney

Washington, D.C. 20268-0001  
August 8, 1997